

stories involving the Dallas Police Department—including the incident involving Anthony “Tony” Timpa that forms the basis of the underlying lawsuit.

Beyond covering local law enforcement, TDMN also regularly reports on happenings in Dallas’ courts, and maintains an interest in advocating for continued public access to judicial proceedings. TDMN’s short amicus brief on this matter will thus provide the Court with an important perspective on issues raised by the Motion that is not presented by the parties—that of the press. *See City of Dall. v. Hall*, No. 3:07-CV-0060-P, 2008 WL 2622809, at *3 (N.D. Tex. June 30, 2008) (granting leave to file several amicus briefs based on the different “perspectives” and “viewpoints” presented); *see also Villas at Parkside Partners v. City of Farmers Branch*, 245 F.R.D. 551, 555 (N.D. Tex. 2007); *Bush v. Viterna*, 740 F.2d 350, 359 (5th Cir. 1984) (“Where he presents no new questions, a third party can contribute usually most effectively and always most expeditiously by a brief amicus curiae and not by intervention”). TDMN’s interest in the matter is more fully set forth in its brief. *See* Local Rule 7.2(b).

TDMN respectfully requests that the Court grant the requested leave once the stay in this action is lifted, and direct the clerk to file TDMN’s amicus brief at that time.

Respectfully submitted,

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**ATTORNEYS FOR AMICUS CURIAE
THE DALLAS MORNING NEWS INC.**

CERTIFICATE OF CONFERENCE

This certifies that counsel for Movant The Dallas Morning News, Inc. conferred or attempted to confer with counsel for each party affected by the requested relief pursuant to Local Rule 7.1(a). The relief sought is OPPOSED.

Counsel for Plaintiffs, Geoff Henley, indicated that Plaintiffs are unopposed to the relief requested in an email dated March 25, 2019. Counsel for Intervenor Joe Timpa, Susan E. Hutchison, indicated that Intervenor is unopposed to the relief requested in an email dated March 25, 2019.

Counsel for the City of Dallas and Defendants Raymond Dominguez and Domingo Rivera, Tatia Wilson, indicated that her clients are opposed to the relief requested via telephone call on March 25, 2019. Counsel for Defendant Danny Vasquez, Gerald V. Bright, indicated that Defendant Vasquez is opposed to the relief requested via email on March 25, 2019.

Counsel for Movant emailed Edwin P. Voss, Jr., counsel for Defendant Dustin Dillard, regarding the requested relief on March 22, 2019, and left a voicemail following up on that email on March 25, 2019, but has not yet received Defendant Dillard's position. Defendant Dillard is therefore presumed to be opposed. Counsel for Movant emailed Mark E. Goldstucker, counsel for Defendant Kevin Mansell, regarding the requested relief on March 22, 2019, and left a message following up on that email on March 25, 2019, but has not yet received Defendant Mansell's position. Defendant Mansell is therefore presumed to be opposed. Movant will amend this certificate of conference if the positions of the non-movants changes.

/s/ Eric D. Wong
Eric D. Wong

CERTIFICATE OF SERVICE

This certifies that on March 25, 2019, a true and correct copy of the foregoing document was served via the Court's ECF system upon all counsel of record who are registered ECF users pursuant to Federal Rule of Civil Procedure 5(b)(2)(E) and Local Civil Rule 5.1(d).

/s/ Shannon Zmud Teicher
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